

**REMARKS**

In accordance with the foregoing, claims 20 and 21 are pending, under consideration, and have been amended. No new matter is included in this amendment.

**The 35 U.S.C. §102(b) Rejection:**

At page 2 of the Office Action, claims 20 and 21 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent 6,091,808 to Wood et al. This rejection is respectfully traversed. Anticipation requires the presence in a single prior art reference of each element of the applicants' claimed invention, arranged as in the claim. In Wood et al. a communication channel is set up between a telephone 14 and another telephone (not shown) via a telephone switch 16. The telephone switch 16 receives instructions to make the connection via an interface 24 from a web facility 22. The web facility 22 receives a connection command via the network 20. In Wood et al., the telephone switch and the web facility are located remotely from the telephone and the web browser. The arrangement in Wood et al. is such that the telephone switch does not make a connection between the telephone 10 and the other telephone (not shown) without benefit of an action by the web facility.

Claims 20 and 21 have been amended to recite that the telephone and the information terminal are "operable by a user" to more clearly point out the invention as disclosed in the present application. As recited in claims 20 and 21, the system accesses a web server for the purpose of retrieving telephone numbers but does not access the web server for the purpose of making a telephone connection between the telephone 240 (application FIG. 2) and another telephone (not shown). That is, "the telephone plug in automatically dials the selected telephone" "independently of the web server." Although the system in Wood et al. accomplishes making a connection between a telephone operable by a user and another telephone, the apparatus by which such purpose is accomplished is substantially different from the apparatus claimed in the present invention.

In claims 20 and 21, as amended, it is clearly pointed out that the "information terminal" comprises a web browser and a telephone plug-in connected with the web browser. "Terminal" is defined in Jerry M. Rosenberg's, Dictionary of Computers, Information Processing, and Telecommunications, John Wiley & Sons, New York, 1984, a copy of which is provided herewith:

terminal - (1) a point in a system or network at which data can either enter or leave, (2) a device, usually equipped with a keyboard and a display device,

capable of receiving and receiving information over a link."

Thus, applicants submit that a definition of terminal, which would be generally accepted by a person of ordinary skill in the art, would not encompass either a network or devices to which the terminal may remotely connect via a link. The Examiner appears to be reading the claims as if the web browser and plug in were separately recited in the system rather than recited as a constituent parts of the information terminal.

The Examiner refers to Newton's Telecom Dictionary concerning the meaning of the term "web browser." Newton's Telecom Dictionary, 1998, defines a plug-in as a software component that extends the capabilities of web browsers, such as Netscape. Nothing in Wood et al. describes the web facility 22 as including a web browser, as that term appears to be generally accepted as demonstrated by Newton (1998); thus it would not have been obvious to a person of ordinary skill in the art at the time the invention was made to have included a telephone plug-in in the web facility 22 or in the telephone switch 26. In Wood et al., in order to connect the telephone 10 with another telephone, the web facility 22 communicates call control signals and information relating to the telephone switch 16 via the path 24 and the SCI 26. (See col. 4, lines 40-43). Thus, no telephone plug-in in Wood et al. automatically dials the selected telephone number as claimed in claims 20 and 21, simply because Wood et al. does not have a plug-in as that term is normally used by a person of ordinary skill in the art.

**The 35 U.S.C. §103(a) Rejection:**

At page 2 of the Office Action, claims 20 and 21 are rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent 6,091,808 to Wood et al. in view of U.S. Patent 5,764,736 to Shachar et al. This rejection is respectfully traversed. The Examiner appears to admit that Wood et al. does not use the term plug-in or describe the plug-in and alternatively appears to assert that a plug-in is inherent in Wood et al. However, if a person of ordinary skill in the art were to conclude that Wood et al. includes a plug-in, such plug-in is not "a telephone plug-in connected with the web browser, the second telephone line and the telephone," as recited in claim 20 or "a telephone plug-in connected with the web browser, the telephone line and the telephone," as recited in claim 21. Even if Shachar et al. does disclose a plug-in as asserted by the Examiner, the Examiner has not demonstrated why a person of ordinary skill in the art would have had an incentive to add a plug-in to the apparatus of Wood et al. Although the results achieved by the apparatus of Wood et al. and the results achieved by the apparatus claimed in the present invention are similar, i.e., establishing a telephone connection between two

telephones, a person of ordinary skill in the art at the time the invention was made would not have been motivated to modify the apparatus of Wood et al. with the alleged plug-in of Shachar et al. because doing so would not have achieved a different result.

It is applicants' claims as a whole which must be considered. Where the claims are considered as a whole, it is clear that the invention as now claimed in claims 20 and 21 distinguishes from Wood et al. and would not have been obvious to a person of ordinary skill in the art at the time the invention was made in view of Wood et al. and Shachar et al.

As stated at col. 2, lines 31-35 of Wood et al. "Thus, the invention enables subscribers to control telephone connections, and obtain information from telephone directories and call logs, using a web browser without any need for extra hardware to couple the browser to the telephone." That is, Wood et al. teaches away from coupling of the browser and the telephone.

**Conclusion:**

If there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

It is respectfully requested that the present amendment be entered as the amendment at least places the claims in better form for appeal.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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